

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**DEFENDANTS MATTHEW PARROTT, MATTHEW HEIMBACH, AND
TRADITIONALIST WORKER PARTY'S OFFER OF JUDGMENT**

TO: Michael Bloch, Esq.
Kaplan Hecker & Fink LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Matthew Parrott, Matthew Heimbach, and Traditionalist Worker Party (the "Offering Defendants") hereby offer to allow judgment to be entered against them, jointly and severally, in the sum of \$50,000.00 (fifty thousand dollars) less the amount of costs accrued in favor of Plaintiffs, with the result that the total judgment amount, including recoverable costs, which the Offering Defendants shall be obligated to pay shall be \$50,000.00. This shall be the total amount to be paid by the Offering Defendants on account of any liability claimed in this action, including all costs of suit, litigation expenses, and attorneys' fees otherwise recoverable in this action by Plaintiffs.

If Plaintiffs do not accept this offer, they may become obligated to pay the Offering Defendants' costs incurred after the making of this offer.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and is not to be construed as either an admission that any of the Offering Defendants are liable in this action, or that any of the Plaintiffs have suffered any damage. This Offer of Judgment shall not be filed with the Court unless (a) accepted, or (b) in a proceeding to determine costs.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Joshua Smith', with a long horizontal flourish extending to the right.

Joshua Smith, Esq.
Pennsylvania Bar ID No. 207585
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807 Crane Avenue
Pittsburgh, Pennsylvania 15216
(917) 567-3168 (phone)
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*Counsel for Defendants Matthew Parrott,
Matthew Heimbach, and Traditionalist
Worker Party*

Dated: September 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, I served the foregoing Offer of Judgment on Michael Bloch, Esq., counsel for Plaintiffs, via electronic mail at mbloch@kaplanhecker.com.



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